



Miedel & Mysliwiec LLP

March 23, 2022

VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Maria del Carmen Valerio de Rodriguez, 22 Mj. 2209*

Dear Judge Netburn:

On March 9, 2022, this Court appointed me to represent Maria Rodriguez in the above-captioned case. The Court set a deadline of March 23, 2022 for Ms. Rodriguez to find a second financially responsible person to co-sign her bond, and a deadline of the same date for Ms. Rodriguez's husband to be interviewed by the government and confirmed as a financially responsible person. It is my understanding that a government employee spoke with Ms. Rodriguez's husband for that purpose earlier today and that he was confirmed as a financially responsible person.

I write with a request to follow up on the Court's indication at the presentment that counsel should make real efforts to find a second financially responsible person to co-sign Ms. Rodriguez's bond. On March 22, 2022, my office spoke with Nelson Delerme, who is a home attendant and co-worker of Ms. Rodriguez's. Nelson informed us that he would be willing to sign Ms. Rodriguez's bond as a moral suasion co-signer, but that due to his lack of significant financial resources, he would not be comfortable agreeing to be liable in the very unlikely event Ms. Rodriguez failed to comply with her conditions of release.

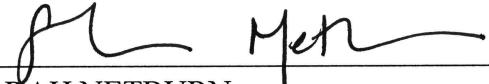
Accordingly, and without objection from the government through AUSA Kaylan Lasky, I respectfully request that the Court modify Ms. Rodriguez's conditions of release such that the second financially responsible person co-signer be converted into a moral suasion co-signer. I further request without objection from the government that the Court extend the deadline for Nelson to sign Ms. Rodriguez's bond in person by one week, to March 30, 2022.

Thank you for the Court's consideration of this letter motion.

Respectfully submitted,

The bail modification request is GRANTED.

SO ORDERED.


SARAH NETBURN
United States Magistrate Judge

March 24, 2022
New York, New York